

1 HONORABLE THOMAS S. ZILLY
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE
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10 CHAD EICHENBERGER, individually and on
behalf of all others similarly situated,

11 NO. 2:14-CV-00463

12 Plaintiff,

13 v.
14 SECOND STIPULATION REGARDING
15 Defendant.

16 In order to efficiently manage the pleadings and anticipated motion practice, Plaintiff
17 Chad Eichenberger (“Eichenberger”) and Defendant ESPN, Inc. (“ESPN”) agree and stipulate as
18 follows:

19 1. Pursuant to the Court’s Minute Order dated May 30, 2014, as stipulated by the
20 parties, ESPN’s deadline to respond to the Complaint is June 30, 2014.

21 2. Eichenberger has informed ESPN that he will file a First Amended Complaint on
22 or before June 30, 2014. ESPN therefore will not respond to the original Complaint.

23 3. ESPN will file a motion to dismiss the First Amended Complaint on or before
24 July 31, 2014.

25 4. The Rule 26(f) conference, if necessary after the Court’s ruling on ESPN’s
26 motion to dismiss, shall be held within 14 days of the Court’s order.

SECOND STIPULATION REGARDING INITIAL
SCHEDULING DATES - 1
(No. 2:14-CV-00463)

23824515.1 {02583561.DOCX;1 }

CAIRNCROSS & HEMPELMANN, P.S.
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1 5. The Initial Disclosures, if necessary after the Court's ruling on ESPN's motion to
 2 dismiss, shall be made within 14 days of the Rule 26(f) conference.

3 6. The Joint Status Report and Discovery Plan, if necessary after the Court's ruling
 4 on ESPN's motion to dismiss, shall be filed within 14 days of the Rule 26(f) conference.

5 7. The deadline for Plaintiff to file a motion for class certification pursuant to LCR
 6 23 shall be stayed pending the entry of a scheduling order by the Court.

7 8. By entering into this stipulation, ESPN does not waive any defenses.

8 Eichenberger and ESPN respectfully request that the Court issue the Proposed Order filed
 9 herewith.

10 DATED this 27th day of June, 2014.

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SECOND STIPULATION REGARDING INITIAL
 SCHEDULING DATES - 2
 (No. 2:14-CV-00463)

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1 Certificate of Service

2 I, Sue E. Den, certify under penalty of perjury of the laws of the State of Washington that
3 on June 27, 2014, I electronically filed this document entitled SECOND STIPULATION
4 REGARDING INITIAL SCHEDULING DATES using the CM/ECF system which will send
5 notification of such filing to the following persons:::

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24 DATED this 27th day of June, 2014, at Seattle, Washington.

25 _____
26 /s/ Sue E. Den

27 Andie C. Scoggins
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34 SECOND STIPULATION REGARDING INITIAL
35 SCHEDULING DATES - 3
36 (No. 2:14-CV-00463)

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